

CLARK SMITH VILLAZOR

Clark Smith Villazor LLP
666 Third Avenue, 21st Floor
New York, NY 10017
www.csvllp.com

RODNEY VILLAZOR
T 212 377 0850
rodney.villazor@csvllp.com

August 15, 2024

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to modify his home confinement bail condition from home incarceration (Dkt. 171) as modified by this Court to curfew. Mr. Goetsche's hours of restriction to the residence shall be directed by Pretrial Services. Pretrial Services and the government, through AUSA Anthony Torntore, have no objection to this proposed request. Thank you in advance.

The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goetsche to remain under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkts 187, 193, 196, 225, 229, 241, 252, 258, 262, 270, 274, 281, 283, 288, 290, 305, 311, 323, and 348). The Court previously denied a motion to modify bail conditions (dkt. 268). The aforementioned proposed modification to home confinement on curfew would not otherwise modify any other conditions as previously set forth or modified by this Court.

Respectfully submitted,

/s/ Rodney Villazor

Rodney Villazor, Esq.
CLARK SMITH VILLAZOR LLP

cc: Matthew Menchel, Esq.
Sean Buckley, Esq.
Carolina Leung, Esq.
Government counsel of record (via ECF and e-mail)
U.S. Pretrial Services Officer Barbara Hutchingson (via e-mail)
U.S. Pretrial Services Officer Kelly G. Fernandes (via e-mail)
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)